

WASHINGTON REFUSE & RECYCLING ASSOCIATION

July 28, 2005

Mike Gallagher, PBT Coordinator Department of Ecology PO Box 47600 Olympia, WA 98504

Dear Mr. Gallagher,

On behalf of the Washington Refuse and Recycling Association (WRRA) I wish to thank you for the opportunity to review and respond to the Draft Persistent Bioaccumulative Toxins (PBT) Rule, Chapter 173-333 WAC – Persistent Bioaccumulative Toxins Regulation.

First, I want to compliment the department and your own efforts to include diverse stakeholders in this proposed rule development and to accommodate the legitimate requests of the business community.

The following comments are submitted for your consideration:

- 1) We would like to ask that a member of the solid waste handling and recycling industry be included in the advisory committee.
- 2) While it is Ecology's and WRRA's desire to reuse and recycle as much of the waste stream as possible, this proposed rule may result in less recycling of materials that are currently recycled today.

If you should have any questions regarding our comments, I would be pleased to meet with you or speak with you at your convenience.

Respectfully submitted,

Brad R. Lovaas

Executive Director

Washington Refuse & Recycling Association